

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

IN RE:)
)
 MARTIN T. TAN) CHAPTER 11
 Debtor) CASE NO. 07-16323
)

DEBTOR'S APPLICATION TO EMPLOY COUNSEL

To the Honorable U.S. Bankruptcy Court:

With respect to this, the Debtor's Application to Employ Counsel, Martin T. Tan, (the "Debtor"), respectfully represents that:

1. The Debtor filed a Voluntary Petition under Chapter 11 of the Bankruptcy Code on October 4, 2007, on a pro-se basis. The Debtor has now selected Timothy M. Mauser, Esquire, and the Law Firm of Mauser & Mauser, 98 North Washington Street, Boston, Massachusetts as his counsel to represent him in said bankruptcy proceedings.
3. The Debtor has selected Timothy M. Mauser, Esquire, and the Law Firm of Mauser & Mauser, for the reason that they have had experience in bankruptcy proceedings.
4. To the best of the Debtor's knowledge, Timothy M. Mauser, Esquire, and the Law Firm of Mauser & Mauser, represents no other entity in connection with the handling of this Debtor's bankruptcy proceedings and that they hold no interest adverse to the interest of the Debtor with respect to these bankruptcy proceedings.

WHEREFORE, the Debtor prays that he be authorized to employ the said Timothy M. Mauser, Esquire, and the Law Firm of Mauser & Mauser as his counsel in these bankruptcy proceedings, under Chapter 11 of the Bankruptcy Code.



Martin T. Tan

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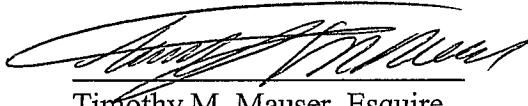
AFFIDAVIT OF PROPOSED COUNSEL

I, Timothy M. Mauser, hereby solemnly make oath that:

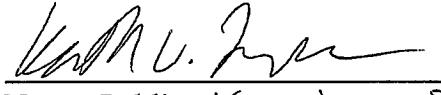
1. I am an attorney and counselor at law, duly admitted to practice in the Commonwealth of Massachusetts and in this Court.
2. I am a member of the law firm of Mauser & Mauser and maintain an office for the practice of law at 98 North Washington Street, Boston, Massachusetts 02114
3. Neither I nor any member of my firm holds or represents any interest adverse to the above-named Debtor.
4. Neither I nor any attorney affiliated with Mauser & Mauser has any connection with the above-named Debtor, his creditors, or any other party in interest herein, or their attorneys, except that Mauser & Mauser represents said Debtor in these bankruptcy proceedings. I am and each member of my firm is a "disinterested person", as the term is defined in 11 U.S.C. sec. 101(14).
6. I have not agreed to share with any person (except members of my firm) the compensation to be paid for the services rendered in this case.
7. To date I have received \$7,000.00 as a retainer in this matter from the Debtor's mother-in-law.

8. I shall amend this statement immediately upon my learning that (a) any of the within representations are incorrect or (b) there is any change of circumstances relating thereto.

9. I have reviewed the provisions of MLBR 2016-1.



Timothy M. Mauser



Notary Public: Katherine V. Forde
My Commission Expires: 12/27/2013

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ORDER AUTHORIZING EMPLOYMENT OF COUNSEL

Upon consideration of the Application of the Debtor for authority to employ Timothy M. Mauser, Esq. and the Law Firm of Mauser & Mauser as counsel to represent him in proceedings with respect to legal matters arising pursuant to the Chapter 11 proceedings of the above-named Debtor, and it appearing that Timothy M. Mauser, is an attorney duly admitted to practice in this Court, and the Court being satisfied that he represents no interest adverse to said Debtor, which would affect his ability to properly represent the Debtor, it is:

ORDERED, that the Debtor be and hereby is, authorized to employ Timothy M. Mauser, Esq. and the Law Firm of Mauser & Mauser to represent him in all matters relating to legal matters arising pursuant to its Chapter 11 proceedings, and it is further

ORDERED, that the compensation will be subject to the last sentence in 11 U.S.C. sec. 328(a), and it is further

ORDERED, that compensation for the said Timothy M. Mauser and the Law Firm of Mauser & Mauser will be determined by the Bankruptcy Court.

Dated this _____ day of _____, 2007.

U.S. Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
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CERTIFICATE OF SERVICE

I, Timothy M. Mauser, do hereby certify that I have this day served a copy of the enclosed Debtor's Application to Employ Counsel, Affidavit of Counsel, and proposed Order upon the following parties in interest to said action by serving a copy of the same, as indicated to:

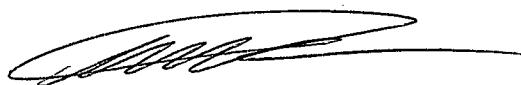
By ECF:

John Fitzgerald, Office of the United States Trustee, Boston, Massachusetts

By Regular Mail:

Martin T. Tan
321 Commonwealth Avenue
Newton, MA 02467

and the entities on the attached service list.



Timothy M. Mauser, Esq.
Mauser & Mauser
Suite 305
98 North Washington Street
Boston, MA 02114
(617) 338-9080
BBO# 542050

Dated: October 19, 2007
3371.01.wpd

AAA Financial Services
P.O. Box 15026
Wilmington, DE 19850

Ace Gaming LLC The Sands
Indiana & Brighton Pk
Atlantic City, NJ 08401

American Express
P.O. Box 740640
Atlanta, GA 30374

Aspire Visa
P.O. Box 105555
Columbus, GA 31902

Bank of America
P.O. Box 15026
Wilmington, DE 19850

Beneficial HSBC Group
422 Walpole Street
Norwood, MA 02062

Boardwalk Regency Corp
2100 Pacific Avenue
Atlantic City, NJ 08401

Capital One Services, Inc.
15000 Capital One Drive
Richmond, VA 23238

Chase Card
P.O. Box 15298
Wilmington, DE 19850

Chisari, Salvatore
104 Adams Avenue
West Newton, MA 02465

Citi Card
P.O. Box 6500
Sioux Falls, SD 57117

Cristofori, Mark
291 Watertown Street
Newton, MA 02458

HSBC
P.O. Box 81622
Salinas, CA 93912

Levine, Jeffrey S.
5 Nolan Farms
Wayland, MA 01778

M.P.G.E. Foxwoods
P.O. Box 3777 Route 2
Mashantucket, CT 06338

MGM Grand Hotel, LLC
3799 Las Vegas Blvd
South Las Vegas, NV 89109

Marina District Dvpt LLC
One Borgata Way
Atlantic City, NJ 08401

Newton-Wellesley Hospital
2014 Washington St
Newton, MA 02462

RBS
P.O. Box 7092
Bridgeport, CT 06601

RIH Acquisitions NJ, LLC
Boston & The Boardwalk
Atlantic City, NJ 08401

Sears Card
P.O. Box 6922
The Lakes, NV 88901

Sovereign Bank
450 Penn Street
Reading, PA 19602

Tennant, Walter
1149 Washington St
West Newton, MA 02465

Trump Taj Mahal Assoc.
1000 Boardwalk
Atlantic City, NJ 08401

Vecchio, Thomas J.
22 Lory Drive
Waltham, MA 02452

Watertown Savings Bank
60 Main Street
Watertown, MA 02472

Wells Fargo Financial
P.O. Box 14433
Des Moines, IA 50306

Wells Fargo Financial Massachusetts, Inc
4137 121st st
Urbandale, IA 50323

c/o Jay Bourgeois
JJ Harwood Floors
101 Clematis Avenue
Waltham, MA 02451

Henry Bourgeois
23 Cedar Hill Lane
Waltham, MA 02452